

Purpose	•	Establish the documentation required for evaluating internal controls over financial reporting related to departmental financial statements to withstand the rigors of audit.
Key Activities	•	Identify and Document Processes and Sub-Processes Identify and Document Sub-Process Risks and Controls Document Entity Risks and Controls
Required Templates	•	AART Toolkit





#### **PROCEDURES**



The Planning phase has been completed: the Material Accounts for each Site were identified. Now the relevant processes for each material account need to be identified and recorded. Entity controls also need to be documented.

The Documenting phase should be completed by the Site/LPSO Assessment Team or their designated representatives. It is recommended that one individual maintain the official Site/Field/LPSO tools to maintain the consistency and integrity of the content.

### A. Prepare the Site/Field/LPSO AART.



#### **REQUIREMENTS**

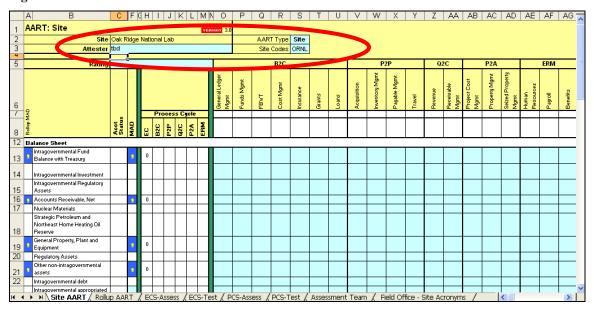
Site/FO/LPSO: Each Site/FO/LPSO will complete the AART Toolkit.

FO/LPSO: Each FO/LPSO is required to also rollup data reported to them.

1. Using the AART Toolkit provided, fill in the Attester field on the Site AART worksheet and select the appropriate Site/FO/LPSO Code.

NOTE: The Attester may have been defined in the Rollup AART.

Figure 1





This will automatically populate the Attester, Site / Field Office / LPSO Name, and location codes throughout the workbook.





# B. Identify and Record the Processes at the Site/Field Office/LPSO for Each Material Account.

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SITE: The Field Office may provide a listing of the applicable accounts to each

Site. Otherwise, the Field Office may require each Site to populate the

MAD column and update the Rollup AART with the results.

FIELD OFFICE: Material accounts have not be pre-populated and will need to be

indicated on the Site AART worksheet.

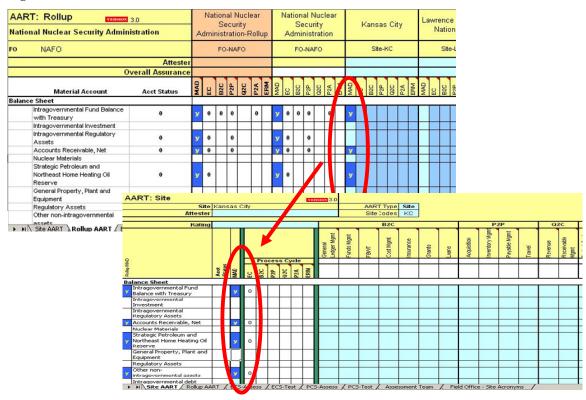
LPSO: If an LPSO has been identified as having to perform a Process Control

Evaluation on certain Material Accounts, these accounts will be prepopulated with 'Y's on the Site AART worksheet. Otherwise, the "Only

Entity Controls Evaluated" box will have a 'Y' pre-populated.

1. If the Field Office provided the listing of the applicable accounts on the Rollup AART, the Site must copy the Material Accounts Definition (MAD) column (starting with the first Material Account) from the Rollup AART and paste the values into the associated Site AART MAD column.

Figure 2

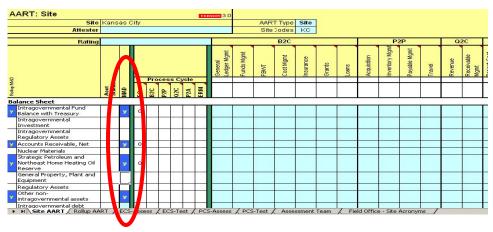






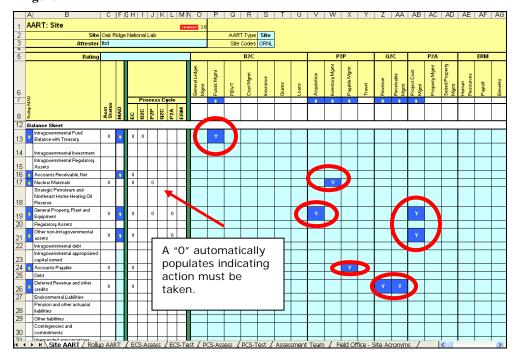
2. The Field Office and those Sites that did not receive a listing of applicable accounts on the Rollup AART worksheet, must enter a 'Y' in the MAD column on the Site AART worksheet to indicate the material accounts.

Figure 3



3. For those accounts identified as being material, enter a "Y" to indicate the processes that impact the specified Material Accounts for the relevant Site / Field Office / LPSO.

Figure 4





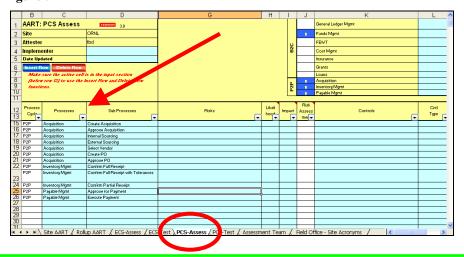


4. Navigate to the PCS-Assess worksheet and record the sub-processes for the processes marked with a "Y" in the process list.



The processes are automatically populated with a "Y" based on the selections on the Site-AART worksheet.

Figure 5<sup>1</sup>



On the ECS-Assess worksheet, the Areas and Sub-Categories have been predefined from the GAO Internal Control Standards to ensure consistency across the organization.



On the PCS-Assess worksheet, Processes must be selected from the drop down list found within the 'Processes' cell. This list has been created from the Joint Financial Management Improvement LPSO (JFMIP) manuals.

There may be multiple sub-processes for each process which must be recorded on separate rows in the PCS to facilitate the Evaluation phase.

For examples of sub-processes, refer to the A-123 Process Cycles, Processes and Crosswalk to JFMIP on the CFO A-123 Website.

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<sup>&</sup>lt;sup>1</sup> Most screen shots reference the PCS-Assess Worksheet, though the columns are the same for both PCS and ECS-Assess Worksheets.







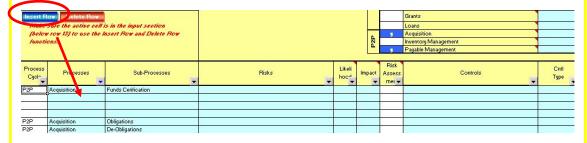
#### **AVAILABLE FEATURES IN PCS-ASSESS & ECS-ASSESS:**

**Auto-filter Feature:** To aid in the use of the PCS-Assess and ECS-Assess, certain columns have the ability to be filtered (e.g. select 'acquisition' in the Process column to view only those rows in the PCS-Assess that belong to the acquisition process).

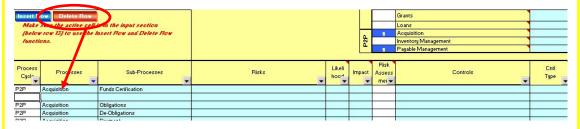
Process Cycl	Processes	Sub Processes ▼	Risks	Likeli hood	Impact -	Risk Assess me(~	Controls	Cntl Type
P2P	Acquisition	Create Acquisition						
P2P	Acquisition	Approve Acquisition	7		7	-		10
P2P	Acquisition	Internal Sourcing			6	ģ		
P2P	Acquisition	External Sourcing			,			
P2P	Acquisition	Select Vendor						
P2P	Acquisition	Create PO	27		1	1		10
P2P	Acquisition	Approve PO			ŝ			

The columns available to be filtered begin with the 'Process Cycle' column and continue through the 'Control Inefficient' Column and include all columns in between. A column that shows an upside down triangle ( ) represents a column that allows filtering. This feature is best used on columns such as Process Cycle, Processes, and Sub-Processes.

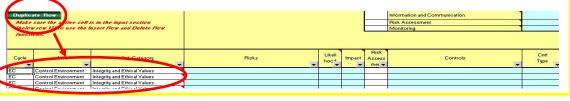
Insert New Row: As Processes and Sub-Processes are identified on the PCS-Assess worksheet, it may become necessary to insert a new row. This can be done anywhere between rows 15 and the 'End' row. Select the row where the inserted row(s) will be added beneath. Click on the 'Insert Row' button and enter the number of rows to be inserted. Click 'Ok' to have the new rows inserted.



**Delete Row:** Should it be necessary to delete a row from the PCS-Assess worksheet, select the row to delete and click on the 'Delete Row' button. Only one row can be deleted at one time.



**Duplicate Row:** While working in the ECS-Assess worksheet, it may become necessary to duplicate a row. This can be done by selecting the row to be duplicated and clicking the 'Duplicate Row' button. This will insert a new row below the selected row and populate the 'Cycle', 'Area', and 'Sub-Category' columns with the data from the selected row. Rows cannot be deleted once the duplication has been completed.







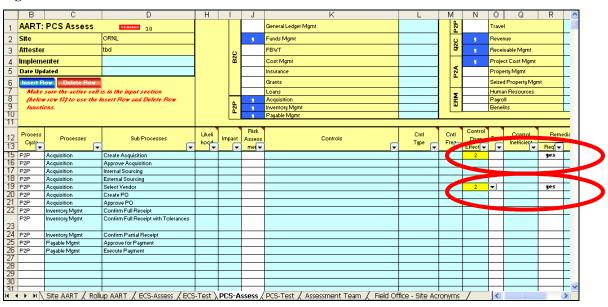
### C. Identify Sub-Processes that Require Initial Remediation.

1. Identify sub-processes that require initial remediation and assign a status of "2-Initial Remediation" in the **Control Design Effective** column.



These sub-processes may have been identified through Tiger Team communications, audits, and such, requiring immediate remediation.

#### Figure 6







# D. Review Existing Documentation for Entity Controls and Processes.



#### **REQUIREMENTS**

Documentation includes, at a minimum, end to end business and system procedures for completing transactions; systems used in the process; control descriptions (narratives); related entity controls and organizational entities that perform these activities. Additional considerations are listed in the CFO Council Implementation Guide.

There are no standard formats for documentation beyond the requirement for documenting organizations, processes, risks, and internal controls over financial reporting in enough detail to withstand the rigors of audit.



Completing the AART tools does not represent sufficient documentation of the site A-123 process, although it is a critical part. In addition to the information below, please refer to the CFO Council Implementation Guide for OMB Circular A-123 and the COSO framework for more information on capturing adequate documentation.

Maintaining required documentation is a primary activity of A-123 compliance. Documentation must be maintained not only for entity controls and process / subprocesses, but for all aspects of the A-123 program being implemented. Therefore, documentation is a cross-cutting activity that affects all phases of the A-123 process. For example, the implementation plans are the key documentation points in the planning phase. Similarly, the reporting phase represents a key documentation point. As such, this section briefly touches on each phase's documentation requirements.

#### 1. Review Existing Documentation:

Locate existing documentation for all entity controls and processes / sub processes not in remediation. Review and update to ensure that standards required by the CFO Council Implementation Guide are met.



#### **REQUIREMENTS**

For Entity Controls, the Organizational Structure documentation must be reviewed for accuracy.

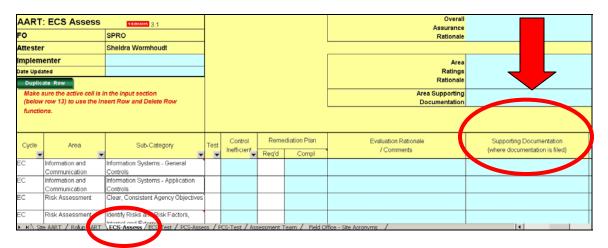




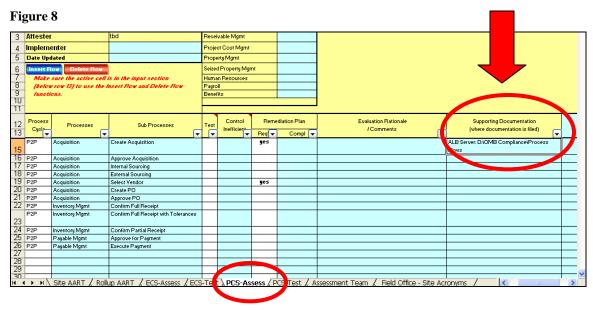
### E. Create New Documentation

- 1. Create documentation for all entity controls and processes / sub-processes that do not have existing documentation and are not in remediation.
- 2. For Entity Controls, enter the location where the supporting documentation is housed in the **Supporting Documentation** column of the ECS-Assess worksheet.

Figure 7



3. For Process / Sub-Processes, enter the location where the supporting documentation is housed in the **Supporting Documentation** column of the PCS-Assess worksheet.









Documentation Standards will be put in effect starting FY 2007. It is highly recommended to use the Process Documentation standards for all newly created documentation.

#### 4. Examples of Good Documentation:

The form and extent of documentation depends in part on the nature and complexity of the controls; the more extensive and complex the controls, the more extensive the documentation. Documentation may be electronic, hard-copy format or both and must be readily available for examination. Documentation could include organizational charts, flow charts, questionnaires, decision tables, or memoranda. Documentation may already exist as part of normal policy or procedure; however, the Site or LPSO Assessment Team should separately identify, verify and maintain the documentation it uses in making its assessment.

Existing documentation prepared by internal or external auditors may also be used, but again, the Site or LPSO Assessment Teams must take responsibility and verify and maintain the documentation. Documentation should also include appropriate representations from officials and personnel responsible for monitoring, improving and assessing internal controls.

After the initial assessment, subsequent assessments may focus on updating existing documentation. All documentation and records shall be properly managed and maintained; therefore, Sites / Field Offices / LPSOs will need to establish, or review existing retention policies for documentation (paper and electronic media).



Figure 9 – Sample Process Map with Risks and Controls Identified EFASC Responsible: Nobody Office of Finance and Oversight Responsible: Nobody Program Office Responsible: Nobody Oracle Responsible: Nobody (1) 2.1.2.2.1 Make Straight Obligation Purchase 2.1.2.2.2 2.1.2.2.3 Verify Signature <u>/e</u> 2.1.2.2.4 Create Purchase Order in STARS 2.1.1.2 Availability Process 2.1.2.2.5 Send to Oak Ridge for Payment and Costing 2.1.2.2.10 Process Purchase Order 2.1.2.2.6 Write Line Number, Number, Shipping Number, and Distribution Number on Purchase 2.1.2.2.11 Post Obligation Order (Terminate Process 2.1.2.2.7 File Purchase Order 2.1.2.2.8 Credit Card? Terminate Process Distribute Credit Line Memo to Card Holder erminate Process





### F. Required Supporting Documentation

### 1. Documenting Professional Judgment and Decisions:

In addition to documentation maintained to support entity controls and processes / sub processes, documentation must be maintained to support any area where professional judgment is used to formulate a conclusion. This would include: making a subjective assessment of control design effectiveness (in Evaluating); assigning overall entity control and process ratings (Evaluating & Testing); assigning overall Site / LPSO assessments; and, most importantly, when making decisions as to the overall level of assurance that will be provided. This, however, is not an exhaustive list and teams should always be conscious of when professional judgment is the source of a decision/assessment and make sure the rationale is fully documented. This cross-cuts all A-123 phases.

### 2. Planning:

The key documentation for the planning phase is the Site or LPSO Implementation Plan. Refer to the Planning Phase and the Implementation Plan Template for specific documentation requirements.

#### 3. Evaluating:

In addition to the information contained in the "Assess" worksheets of the AART, the Site / Field Office / LPSO must maintain sufficient documentation to support their work in the evaluation phase. Specifically, the rationale for determining entity control and process / sub-process control design effectiveness must be sufficiently documented. While space is provided in the "Test" worksheets of Site / Field Office / LPSO AART to capture a summary of this information, it will likely not be sufficient to represent complete documentation.

### 4. Testing Plans:

In addition to the information contained in the "Test" worksheets of AART, the Teams must develop and maintain detailed test plans to support their work. Test plans would generally include the type of test, the basis for selecting the test, the sample size and basis for the sample, error tolerance, sampling selection methodology, and other information related to the process of testing.

In addition, complete work papers must be maintained that capture the results of the actual testing. This might include actual documents tested with reviewer notes, a written explanation of how test results were considered to arrive at a pass/fail rating and any other pertinent information. Space is provided in the "Test" worksheet of AART to capture





a summary of this information, but it is not sufficient to represent complete documentation.

#### 5. Remediation:

All activities performed in the remediation phase should be fully documented. This would include: current state process maps, future state maps, a corrective action plan, implementing memorandums and related information, and any validations that remediation has been completed to support re-entry into the A-123 documenting phase.

#### 6. Reporting:

The reporting guide provides complete information on what is required to be documented as part of the Reporting Phase.



#### **REQUIREMENTS**

Documentation must be readily accessible and be made available upon request for validation purposes.





### G. Record Risks and Controls

#### Financial Assertions are based on PERCV -

- Presentation and Disclosure;
- Existence or Occurrence;
- Rights and Obligations;
- Completeness and Accuracy;
- Valuation or Allocation

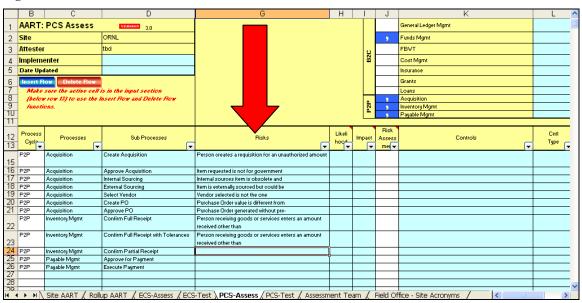
Consider these areas when identifying risks and mitigating controls<sup>2</sup>.

<sup>2</sup> CFO Council Implementation Guide

1. Refer to the documentation and identify and record the risks associated with each sub-process or sub-category. This should be completed for both Process and Entity Control worksheets (PCS-Assess and ECS-Assess).

At a minimum, the Site / Field Office / LPSO should consider the illustrative examples of risks in the GAO Financial Audit Manual (FAM) and the COSO Framework. The FAM and an excerpt of COSO risk areas can be found on the CFO A-123 Website. An Entity Control Risk Matrix that provides a listing of possible Entity Control risks is also available on the CFO A-123 Website.

Figure 10



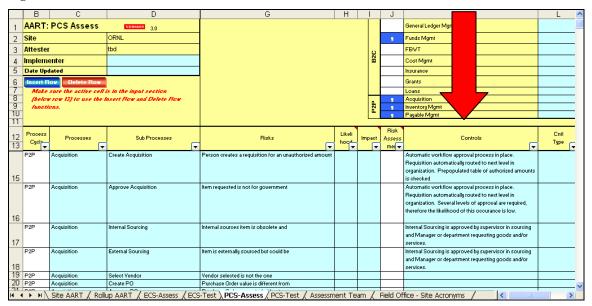




 Refer to the documentation and record the controls in place to mitigate each risk associated with a sub-process or sub-category. This should be completed for both Process and Entity Control worksheets (PCS-Assess and ECS-Assess)

At a minimum, the Site / Field Office / LPSO should consider the illustrative examples of controls in the GAO Financial Audit Manual (FAM). The FAM can be found on the CFO A-123 Website.

Figure 11





There may be multiple risks associated with a sub-process. Each risk must be documented in separate rows. A risk may have multiple controls mitigating it. These controls must be recorded in the same risk row (i.e. same cell). If you wish to record the controls on separate lines use the Alt-<enter> keyboard shortcut to start a new line within a cell.

It is important that each row has a Process and Sub-Process identified before entering the risk, even if the Process and Sub-Process is the same for multiple risks.

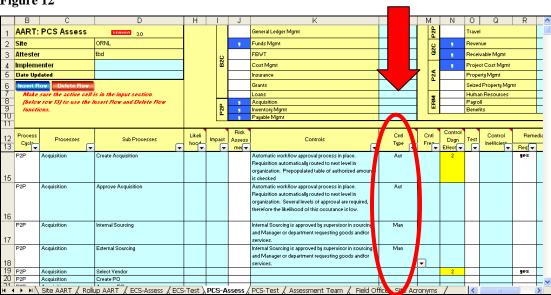




 Refer to the documentation and select the type of control in place in the Control Type column for each sub-process or sub-category. This should be completed for both Process and Entity Control worksheets (PCS-Assess and ECS-Assess)

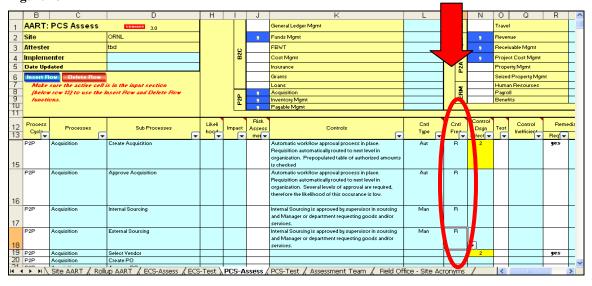
For example: "Workflow within a system that routes a transaction to an authorized individual for approval" should be designated as automated.

Figure 12



4. Select the frequency at which each control is executed in the **Control Frequency** column for each control. This should be completed for both Process and Entity Control worksheets (PCS-Assess and ECS-Assess)

Figure 13









Recurring frequency is a control that executes every time an activity or transaction is run. This may be numerous times in one day.

### H. Update the Implementation Plan

- 1. Document the results of the documenting activities
- 2. Review Implementation Plan for accuracy
- 3. Make and track necessary changes



Major changes to the Implementation Plan will need to be reported in the Quarterly Report.





### **REFERENCES**

#### See CFO A-123 Website for suggested reading material:

OMB A-123 Appendix A CFO Council Implementation Guide for OMB Circular A-123 Financial Audit Manual (GAO-01-765G) DOE OMB Circular A-123, Appendix A, Implementation Plan DOE Interim Guidance for OMB Circular A-123 FY 2005 Audit Report FY 2005 Management Letter

### **ADDITIONAL INFORMATION**

Refer to the CFO A-123 website which will be updated with latest materials including tools, FAQs and additional reading material.

(http://www.cfo.doe.gov/progliaison/doeA123/index.htm)

#### **DEFINITIONS**

Word	Definition			
Attester	The person who will be required to affirm the			
	authenticity of information for the LPSO.			
Cognizant Secretarial	Headquarters Elements that provide significant funding			
Office (CSO)	to Field Offices overseen by the LPSOs.			
Field Office (FO)	Location where the Site Assessment Team manages the			
	A-123 Implementation for its Sites. Only the Field Office			
	provides assurance to the LPSO.			
Headquarters	Lead Program Secretarial Office or Headquarters			
Element	Business Program that is affected by the financial			
	reporting requirements of OMB A-123, Appendix A.			
Implementer	The person responsible for executing the activities to			
	support the Attester's affirmation.			
Lead Program	Headquarters Element whose cognizance includes those			
Secretarial Office	Field Offices that are affected by the financial reporting			
(LPSO)	requirements of OMB A-123, Appendix A. These LPSOs			
	provide oversight activities to Field Offices that directly			
	impact the accounts determined to be material to the			
	Department's financial statements.			
Process	The highest level of sub-processes within a process			
	cycle.			
Process Cycle	An end-to-end sequence of events consisting of the			
	methods and records used to establish, identify,			
	assemble, analyze, classify, and record transactions. <sup>2</sup>			
Site	Unit of a Field Office including the Field Office federal			
	activities and its contractors (both integrated and non-			
	integrated). Predefined by Headquarters.			

<sup>&</sup>lt;sup>2</sup> Adapted from the CFO Council Implementation Guide





### **NEXT PHASE**

